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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

12
13 IN RE: HIGH-TECH EMPLOYEE
ANTITRUST LITIGATION

Master Docket No. 11-CV-2509-LHK

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15 THIS DOCUMENT RELATES TO:

**DECLARATION OF BRADLEY S.
PHILLIPS IN SUPPORT OF NOTICE OF
FILING REVISED REDACTED INTEL
CORP. DOCUMENTS FILED IN
SUPPORT OF DEFENDANTS' JOINT
RESPONSE TO PLAINTIFFS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PLAINTIFFS' MOTION IN
SUPPORT OF CLASS CERTIFICATION
AND RELATED DOCUMENTS**

16 ALL ACTIONS

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20 Date Consolidated Amended Compl. Filed:
21 September 13, 2011

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28 21993751.1 Master Docket No. 11-CV-2509-LHK

DECLARATION OF BRADLEY S. PHILLIPS IN SUPPORT OF NOTICE OF FILING REVISED REDACTED INTEL CORP. DOCUMENTS FILED IN SUPPORT OF DEFENDANT'S JOINT RESPONSE TO PLAINTIFFS' ADMINISTRATIVE MOTION TO FILE UNDER SEAL PLAINTIFFS' MOTION IN SUPPORT OF CLASS CERTIFICATION AND RELATED DOCUMENTS

1 I, Bradley S. Phillips, declare as follows:

2 1. I am a partner in the law firm of Munger Tolles & Olson LLP and am counsel of
3 record for Defendant Intel Corporation (“Intel”) in this lawsuit. I submit this declaration in
4 support of Intel’s concurrently filed Notice of Filing Revised Redacted Intel Corp. Documents
5 Filed In Support Of Defendant’s Joint Response To Plaintiffs’ Administrative Motion To File
6 Under Seal Plaintiffs’ Motion In Support Of Class Certification And Related Documents.

7 2. On May 17, 2013, Intel submitted a declaration from Krystal N. Bowen (Dkt. No.
8 430) identifying a series of documents that Plaintiffs had submitted in support of the Supplemental
9 Class Certification filings that contained Intel confidential information that should be sealed. Ms.
10 Bowen’s declaration identifies the reasons why the information is confidential and should be
11 sealed. A true and correct copy of Ms. Bowen’s declaration is attached as Exhibit A.

12 3. Intel hereby submits revised redacted versions of those documents, which are
13 attached as Exhibit B. The redacted portions of these revised versions of the documents contain
14 confidential Intel information that should be sealed for the reasons described in Ms. Bowen’s
15 declaration.

16 I declare under penalty of perjury under the laws of the United States that the foregoing is
17 true and correct.

18 Executed on October 30, 2013 in Los Angeles, California.

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20 _____
21 /s/ Bradley S. Phillips
22 Bradley S. Phillips
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